

IN THE UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION

IN RE LOUIS TELERICO  
*Debtor*

CASE NO. 17-50236  
JUDGE ALAN M KOSCHIK  
CHAPTER 11

**MOTION OF LOUIS TELERICO TO RESCHEDULE HEARING ON CONFIRMATION OF PLAN  
VERSION 1.3 AND RELATED OBJECTIONS AND MOTIONS**

Louis A. Telerico, the debtor and Debtor in Possession in the within bankruptcy case (“Debtor”), moves the Court to reschedule the hearing currently set for August 28, 2108 at 10:30 AM (“Hearing”) on confirmation of the Plan of Reorganization Version 1.3 of the Debtor [Doc.114] (“Plan”) and the following: 1) Amended Objection to Confirmation of Plan (Docket Number 115)1 [Doc. 123] filed by Bank of America NA; 2) Creditor United States of America’s Objection to Plan Confirmation [Doc. 128]; 3) State of Ohio, Department of Taxation’s Objection to Debtor’s Plan of Reorganization Version 1.3 [Doc. 130]; 4) Treasurer of Portage County, Ohio’s Objection To Disclosure Statement Version 1.3 for Louis a Telerico and Plan Of Reorganization Version 1.3 for Louis a Telerico [Doc.118]; and the 5) Objection of the United States Trustee to Confirmation of Debtor’s Plan of Reorganization [Doc. 131]; 6) Limited Objection to and Reservation of Rights to Plan 1.3 for Louis A. Telerico Filed by Stifel Nicolaus & Company, Inc. (“Stifel”) [Doc. 137] (collectively the “Objections”); 7) Motion of the United States Trustee to Convert Case to a Case Under Chapter 7 or, in the Alternative, to Dismiss Case [Doc. 125] (“Motion to Convert”); and 8) the Debtor’s responses to the Objections and the Motion to Convert [Docs. 138, 139, 140 and 141].

1. Debtor filed this Bankruptcy Case on February 4, 2017 and has continued to operate as Debtor in Possession since that date. No committee of unsecured creditors has been established

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<sup>1</sup> BOA’s Objection refers to Doc. 115 the redlined copy of the Plan; the Debtor believes it intended to refer to Doc. 114, the actual Plan itself..

in this case.

2. The Debtor has reached an agreement with Stifel which will require an amendment to the Plan and will result in Stifel voting in favor of the Plan. It may require re-voting the plan

3. Several parties have consented to the requested rescheduling of the hearing.

4. The Motion to Convert pertains to feasibility of the Plan and good faith which are issues intimately intertwined with the issues on confirmation of the Plan and should therefore be heard at the same time to preserve judicial resources.

5. The only upcoming dates that are bad for undersigned counsel is September 21-28 when he will be out of the office

THEREFORE, the Debtor respectfully requests that this Court enter an order rescheduling the hearing to an appropriate date in the future.

Respectfully submitted,

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**CERTIFICATE OF SERVICE**

A copy of this Motion to Reschedule was served on the following on the date filed by Notice of Electronic Filing through the Court's ECF/CM system. (THE UST does not appear on the court's system but does receive all filings in all bankruptcy cases)

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